



State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

September 8, 2009

EPA Region 5 Records Ctr.



347937

Mr. Mark Durno  
U.S. EPA Large Lakes Research Station/ORD  
U.S. EPA Region 5 Emergency Response # 1  
9311 Groh Road  
Grosse Ile, Michigan 48318-1697

Dear Mr. Durno:

Ohio EPA requests U.S. EPA's assistance to investigate a property in Jackson, Ohio, to assess the applicability of your time critical removal program with respect to abandoned waste. Specifically, a commercial property located at 1020 East Main Street, Jackson, Ohio, was confirmed by Ohio EPA to represent a significant fire/vandalism risk to the City of Jackson. Investigations revealed that this site has a large amount of used oil/water mixture wastes, styrene monomer (D001), aerosol cans (D001), universal waste lamps, unknown wastes, pesticides, PCBs, laboratory wastes, boiler room chemicals, and tanks and piping that may contain liquid wastes abandoned by Meridian Automotive Systems, Inc (MAS). There are at least twenty hydraulic press pits/sumps present on the property, and several are full. On-site contractors estimate that one of the pits full of liquid could total 8,000 to 10,000 gallons of used oil/water. The activities (acetylene torch use) of a scrap steel contractor operating on-site have already resulted in one fire at the MAS facility. Contractors have also stated that trespassers/thieves have compromised the electrical wires and there is now an on-going electrical shock hazard. The local Acting Fire Chief has ordered that no work be conducted inside the building, and due to the excessive risks associated with the large volume of oil, drummed waste and unknown chemicals, he would not allow firefighters to enter the premises.

**Site History:**

MAS previously operated in Jackson, Ohio, manufacturing fiberglass auto body panels, truck panels, and other miscellaneous parts. MAS ceased operations in Jackson during 2007 and began moving equipment out of the plant to operate at another location. Cessation of Regulated Operations began taking place with an estimated completion date of December 31, 2008, however, they continued into 2009. On August 24, 2009, the Acting Jackson Volunteer Fire Chief notified OEPA that a fire occurred in the MAS facility on Sunday August 23, 2009. While in the MAS facility, the fire department noted large volumes of oil in pits. OEPA then learned that MAS filed for bankruptcy and is no longer viable.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

**Conclusion:**

There is an immediate fire risk due to the large unprotected volume of used oil and flammable hazardous wastes present at the MAS facility. Because of these risks to human health and the environment, I hereby request that U.S. EPA conduct a site investigation to assess the applicability of a time critical removal at 1020 East Main Street, Jackson, Ohio. Ohio EPA would also request that it be notified of any activities conducted at this site. If you have any related questions, or require any additional information, please contact Jim Sferra of Ohio EPA's South East District Office at 740-385-5239, or John Schierberl of my staff at 614-644-2955.

Sincerely,



for

Harry E. Sarvis  
Compliance Assurance Section  
Division of Hazardous Waste Management

pc: Jim Sferra, DHWM, SEDO  
John Schierberl, DHWM, CO



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Lugan, Ohio 43138

TELEPHONE: 614-656-6601 FAX: 740-380-6436  
WWW.OLR.STATE.OH.US

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

**INTEROFFICE MEMORANDUM**

**TO:** Harry Sarvis, DHWM, CO

**FROM:** John Rochette, DHWM, SEDO thru Jim Sferra, DHWM, SEDO

**SUBJECT:** Time Critical Removal Referral for the former Meridian Automotive Systems, Inc. facility, 1020 East Main Street, Jackson, Jackson County, OHD000817379

**DATE:** September 1, 2009

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Please find attached the Time Critical Removal Referral information for the former Meridian Automotive Systems, Inc facility located in Jackson, Jackson County, OHD000917379.

DHWM-SEDO believes this facility represents a significant fire risk/vandalism risk to the City of Jackson due to abandoned wastes present on the site. The Southeast District Office recommends that a comprehensive removal action be initiated by USEPA to remove all wastes, flammable liquids materials and any material/waste that may present an immediate threat to human health and the environment.

Should you have any questions regarding this matter, please contact me at 740-380-5262.

JR/JS/jg

Attachment

**OHIO EPA  
TIME-CRITICAL REMOVAL ACTION  
REFERRAL PACKAGE**

**1. Site Location and Responsible Party Information**

A. Site Name: Meridian Automotive Systems, Inc

B. Location: 1020 East Main Street, Jackson, Ohio 45640

C. Owner(s)/Operator(s):

Meridian Automotive Systems, Inc.

999 Republic Drive, Allen Park, Michigan 48101 (MAS is no longer in business)

D. *Brief description of steps taken to compel responsible party(ies) to conduct site remediation:*

Meridian Automotive Systems, Inc. (MAS) has filed for bankruptcy and is out of business. Attempts to contact personnel associated with MAS were unsuccessful. A company named "Ventra Bumper Systems" purchased some assets from the former MAS corporation. The former MAS corporate environmental manager, Ms. Celia Jackson (616-527-8349), was contacted. Of note, her phone number is unchanged from the transition from MAS to Ventra. Ms. Jackson stated that MAS had hired Heritage Environmental but upon bankruptcy, environmental clean-up and cessation of regulated operations per ORC 3745-352, ceased. She further indicated that due to the bankruptcy, MAS is no longer in existence. Ohio EPA also spoke with Michael J. Chapman (513-381-9200 ext. 336). Mr. Chapman represents Liberty Mutual, MAS's insurance company. Ohio EPA informed Mr. Chapman of the environmental liabilities at the site. Upon further discussion, it is believed that Mr. Chapman's primary interest is the investigation of a serious injury that occurred at the plant site when a contractor, hired to re-install fire sprinkler piping, fell into an open pit and was injured.

Mr. John Jones representing Jones Construction, the general contractor removing scrap steel from the facility, was requested by Ohio EPA to remove oil that was present in a ditch adjacent to the facility. The request was made to prevent off-site migration of oil. On August 28, 2009, approximately 1,000 gallons of oil/water mixture was pumped from the ditch and containerized on-site.

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## **2. Site Description and Background Information**

### **A. Description of past or present operations and how wastes were generated:**

MAS manufactured fiberglass auto body panels, truck panels, and other miscellaneous parts. The panels are produced by injection molding into a press. MAS also produced a sheet resin material referred to as "sheet molding compound" or SMC. This is a fiberglass reinforced thermosetting compound. It is manufactured by dispensing mixed resin, fillers, maturation agent, catalyst and mold release agent onto sheets of polyethylene film.

Wastes generated at this facility were typically related to purging resin lines, Dibasic Ester (DBE), waste resin, and significant quantities of used oil from hydraulic presses.

### **B. Site Characteristics**

*Site layout (size, number of buildings, topography, etc.):*

The facility consists of a large (over 300,000 sq. ft.) production building and offices with several unattached support buildings. See attached diagram.

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*Quantity and type of wastes and/or hazardous substances:*

Please refer to attached photographs.

Used oil/water mixture: There are at least 20 hydraulic press pits/sumps on the property. Several pits are full to the top (see photographs) and numerous other pits have an unknown volume of oil or oil/water mixture. Also there are a large number of 55-gallon drums on-site that appear to have used oil in them. No waste analysis has been conducted and no estimates of volume have been developed. However, on-site contractors estimated that one of the pits full of liquid could total approximately 8,000 to 10,000 gallons of used oil/water. The used oil and water was generated from the disassembly of large hydraulic presses (pressure washing during disassembly). Also a containment ditch adjacent to the plant contained oil run-off on the water surface in the ditch. On August 28, 2009, approximately 1,000 gallons of oil/water mixture was pumped from the ditch to prevent off-site migration.

Styrene Monomer (Hazardous waste D001): There are several containers of D001 hazardous waste (styrene monomer) and at least one SMC mix container (estimated at 100 gallons) in the "SMC mix room", that is full of resin/solvent mixture.

Aerosol Cans (Hazardous Waste D001): Four to six drums containing aerosol cans labeled hazardous waste were abandoned.

Radioactive Waste: An analytical instrument with a radioactive source used for evaluating the thickness and density of the fiberglass material product was abandoned on the site. Ohio Dept of Health personnel (Mr. Mike Snee and Mr. Tim Walker) visited the site on 8/26/09, to assess this instrument. ODH has contacted USEPA – radiological health personnel to arrange proper disposal of the radioactive source. This instrument is expected to be disposed of off-site during the week of August 31-Sept. 4, 2009.

Universal Waste Lamps: A large box of universal waste fluorescent lamps was staged and abandoned.

Unknown drummed waste: Numerous 55-gallon drums containing unknown waste that are believed to contain used oil type wastes.

Waste Pesticides: A box of weed killer labeled Poison was abandoned.

PCB waste: Two cardboard boxes labeled "PCB transformer" were abandoned.

Laboratory Waste: Numerous miscellaneous laboratory chemicals were abandoned.

Boiler Room Chemicals: Various additives and boiler room chemicals were abandoned.

Tanks/containers: The facility has many tanks, fuel tanks, product storage tanks, paint mixing containers, etc... Tanks will need to be assessed as to volume and content (e.g. fuel tanks, resin storage tanks, and the large round-ended tank on south side of building).

Piping: Piping from the resin tanks and the paint mix area may contain liquid waste.

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*Analytical data or other documentation on chemical characterization of wastes present (attach analytical):*

No waste characterization and/or sample analyticals have been done at this time.

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*Condition of containers:*

Most containers appear to be in good condition, however spillage and leakage of oil was noted in some container areas.

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*Proximity of population and population density:*

The former Meridian plant is adjacent to a residential area and is in a commercial/industrial located on the south side of the City of Jackson.

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**3. Threats to Public Health and the Environment**

**A. Description of potential exposure to humans, animals or the food chain from hazardous substances or contaminants:**

Due to concerns of a fire risk, the local Acting Fire Chief Dave Channell, in coordination with the State Fire Marshall's Office, ordered that no work was to be conducted inside the building. Due to excess risks associated with the large volume of oil, drummed waste, and unknown chemicals, Mr. Channell stated that if a fire were to occur, he would not allow firefighters to enter the premises. There is an immediate fire risk at the facility due to the large unprotected volume of oil at the site as well as flammable hazardous waste. Currently, a scrap steel contractor is operating in and near the building. Their activities (acetylene torch use) have already resulted in one fire in the building on Sunday, August 23, 2009.

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**B. Actual or potential for release present:**

Ohio EPA personnel observed oil in a retention ditch leading from the facility. This ditch has an oil skimmer, but it is inoperable. A heavy rain could cause oil to migrate past the weir in the ditch. On August 28, 2009, approximately 1,000 gallons of oil/water mixture was pumped from the ditch to prevent off-site migration. See attached photographs.

Also, contractors stated that trespassers/thieves have compromised the electrical wires and that there is an on-going electrical shock hazard.

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C. *Threat of fire or explosion:*

A significant fire (and potential explosion) risk exists at the facility due to the large volume of oil waste and the containers of flammable hazardous waste on-site.

**4. *Assessment of Environmental Hazards and Proposed Response Actions***

A. *Description of hazards (real or potential) posed by site and what actions should be undertaken to reduce or eliminate hazard:*

As stated above, a significant fire risk is currently present at the site as well as a potential for vandalism caused by trespassers. A current hazard also exists with the many pits located in the main factory floor. Measures to protect individuals inside the plant have been taken to mitigate the fall hazard into the pits (*e.g.*, railings, placement of obstructions around the pit, and caution tape). Wastes on the site are in need of proper disposal or recycling.

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**5. *Chronology of Events***

1. 2007, MAS announced it is ceasing operations at the Jackson plant and begins moving equipment out of plant to operate at another location.
2. July, 2008, OEPA contacted MAS in Michigan to request information (notification(s)) regarding compliance with Cessation of Regulated Operations (CRO) requirements.
3. July 7, 2008, MAS submits notification of CRO to Ohio EPA, stating that removal of equipment is proceeding, security controls are in place. Expected completion date of Dec. 31, 2008
4. CRO Removal activities continue into 2009.
5. August 24, 2009. OEPA notified by Mr. Dave Channell, Acting Jackson Volunteer Fire Chief, that a fire occurred in the MAS facility on Sunday, August 23, 2009. While in the facility, FD noted large volumes of oil in pits at the facility. OEPA learns that MAS has filed for bankruptcy and is no longer viable.

6. On August 24, 25 and 26, 2009, Ohio EPA personnel from the Southeast District office visited the facility to assess the type, volume and locations of waste remaining on the site.

**6. *Index of Documents***

1. Facility map
2. Pictures taken at the facility

**7. *Extenuating or Mitigating Circumstances***

N/A

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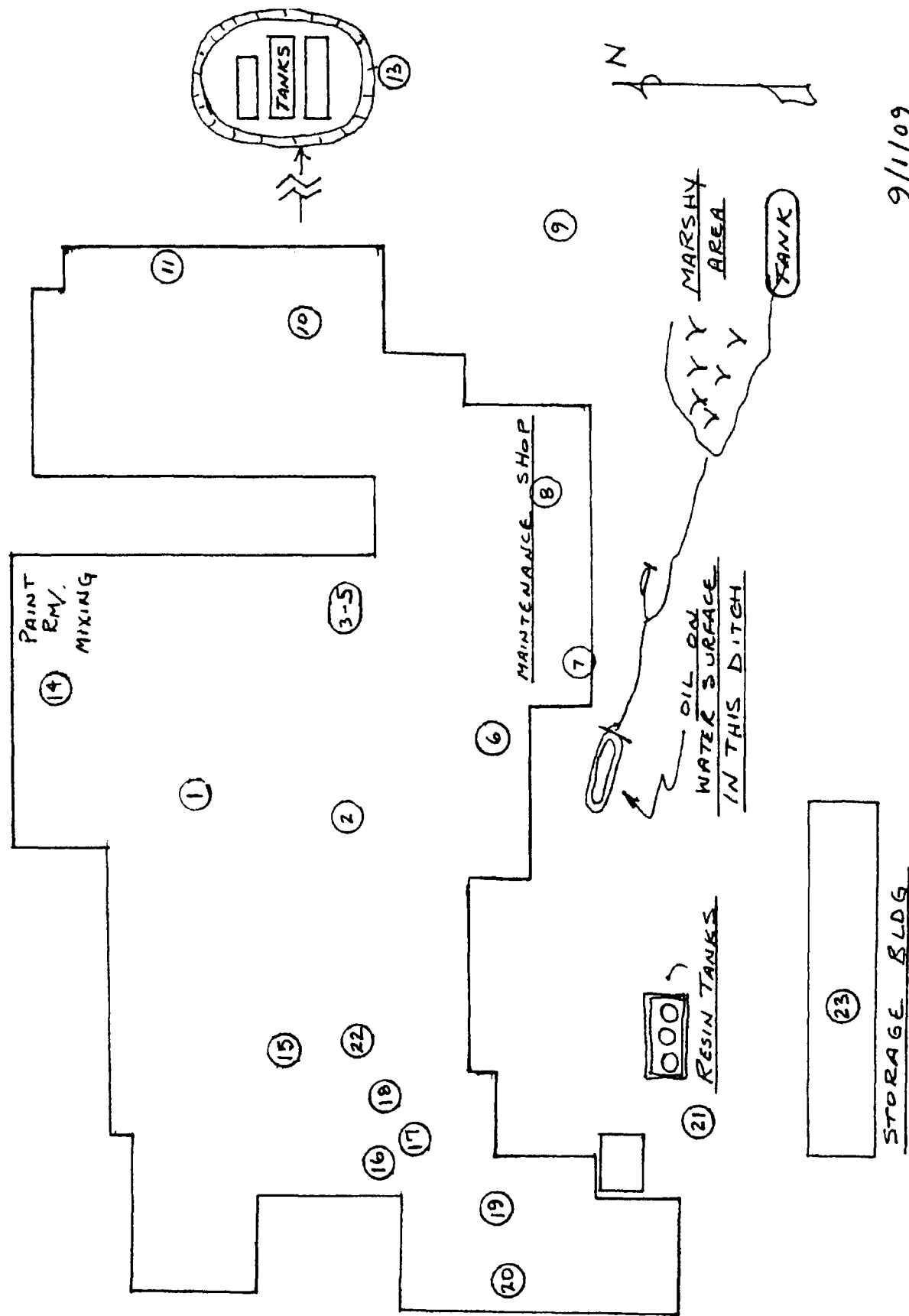
**8. *Contacts***

*District Office:* John Rochotte, 740-380-5262; Jim Sferra, 740-380-5239

*Central Office:* Harry Sarvis, 614-644-3519; John Scheirberl, 614-644-2955

## HW Accumulation BUDG

WASTE LOCATIONS AS SURVEYED BY OH EPA



60116

**MERIDIAN AUTOMOTIVE SYSTEMS  
JACKSON, JACKSON COUNTY, OHIO  
WASTE DESCRIPTIONS, 09/01/09**

1. Cardboard boxes of weedkiller, and two boxes labeled "PCB transformer" (see photo #1)
2. Green 55-gallon drum (oil?) (See photo #2)
3. Black 55-gallon drum (oily waste). (see photo #3)
4. 8 55-gallon drums (oil?), mop bucket full of oil. (see photo #4)
5. Black 55-gallon drum (oily waste)
6. Group of containers: 1 drum of "Pliogrip 9100 adhesive"; 55-gallon drum of aerosol cans; two red "Shell Tellus" oil drums; note: oil on floor in this area. (see pic. #)
7. Parts cleaner: some sludge in the bottom of the Parts cleaner. Located in former maintenance shop. (see photo #5)
8. Box of aerosol cans in former maintenance area.
9. White drum outside, believed to contain primarily rain water – unknown. (See photo #6)
10. Drums of Pliogrip. (see photo #7)
11. Drum of white powder material (see photo #9)
12. Former hazardous waste accumulation building (metal covered roof area) (see photo #10, 11)
13. Large fuel tanks. Uncertain if they contain any fuel oil. (see photo #12)
14. Paint mix room area and paint mix containers. (see photos #13, 14)
15. 55-gallon drum for aerosol cans (see photo #15)
16. Sheet Molding Compound (SMC) Mix Room. Contains mobile mix tubs, some of which contain liquids with strong volatile odor, presumably contain styrene (ingredient in SMC). Blue 55-gallon drum of styrene monomer. Small red containers presumably contain styrene as clean-up solvent. (see photos #16-19)
17. Black 55-gallon drums (oil?) unknown contents. (see photo #20)
18. Blue 55-gallon drum containing styrene monomer (see photos #21,22)
19. Hazardous waste aerosol can drum and yellow fire cabinet contains small "paint can type" products in the bottom of the cabinet. (see photo #23)
20. Former lab area. Numerous small containers, various liquids, chemicals, etc. (see photo #24)

21. Resin tank farm. Unsure if tanks contain resin. (see photo #25)
22. Lab analytical equipment containing a radioactive source (Americium 241 and Beryllium). Ohio Dept. of Health (Mike Snee is the contact, phone # is 614-644-2727) is currently managing the proper disposal of this piece of equipment in coordination with USEPA, Reg, V. (Jim Mitchell is the Reg. V contact). This equipment was moved inside of a locked office (see photos #26,27)
23. Outside storage building. Contains a drum rack of Pliogrip drums in the eastern end of the bldg. and various pieces of equipment/parts. (see photo #28)

**Ohio EPA contacts:**

**John Rochotte, Div. of Hazardous Waste Mgmt.: 740-380-5262**

**Jim Sferra, Supervisor, Div of Hazardous Waste Mgmt.: 740-380-5239**

**Dave Chenault, Program Mgr., Div of Hazardous Waste Mgmt.: 740-380-5292**



**MERIDIAN**



**AUTOMOTIVE  
SYSTEMS**

***Jackson Operations***  
**ENVIRONMENTAL POLICY STATEMENT**

*Meridian's Jackson Operations manufactures fiberglass-reinforced plastic automotive and truck products for global distribution.*

*We are committed to maintain compliance with all environmental laws and regulations, and other requirements. Through a properly implemented and continually improved ISO 14001 environmental management system, every effort will be made to prevent pollution at its source and to support the proper use, handling, and disposal of all materials that can impact the air, land, and water in our community and beyond. Our main objectives for improved environmental performance include:*

- reducing VOC air emissions*
- reuse and recycling activities*
- minimizing the generation of waste*
- conserving natural resources*

*This policy will be communicated to all parties interested in the performance of our environmental management system.*



Photo 1 – Weed Killer and PCB transformers



Photo 2 – Unknown drum believed to be oil waste



Photo 3 – Oily waste



Photo 4 - Unknown waste believed to be used oil related



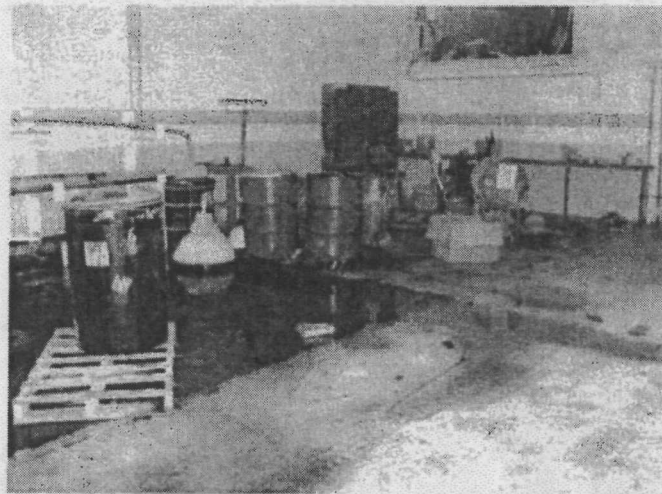


Photo 5 – Oil waste and aerosol can drums



Photo 6 – Unknown contents



Photo 7 – Six pliogrip product drums

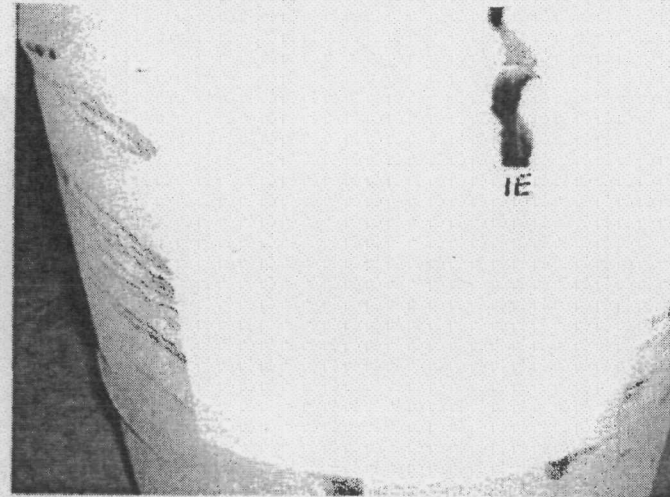


Photo 8 – Pliogrip label

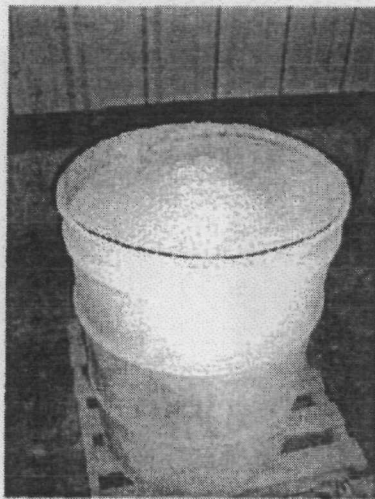


Photo 9 – Unknown white powder believed to be product

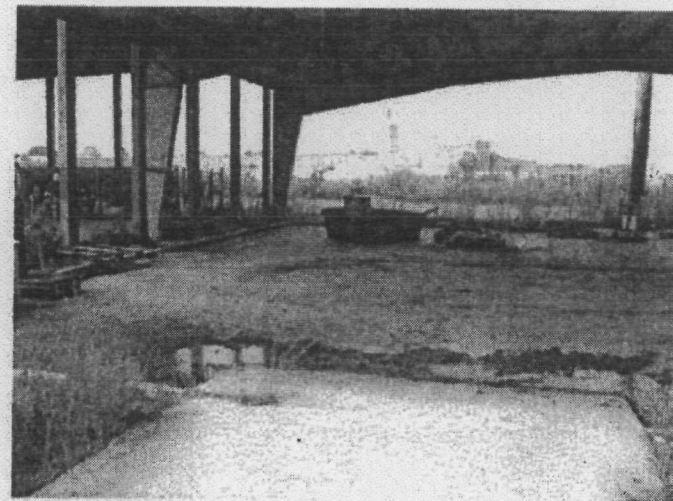


Photo 10 - Former HW storage building



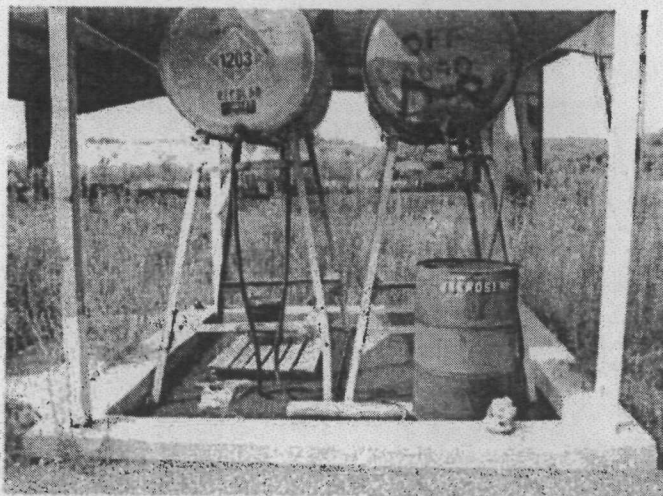


Photo 11 – Fuel tanks near former HW storage building

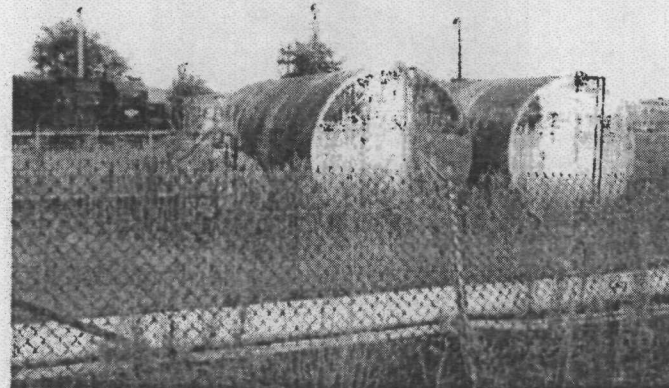


Photo 12 - Heating oil tanks



Photo 13 – Paint mix area, containers



Photo 14 – Paint mix area, containers

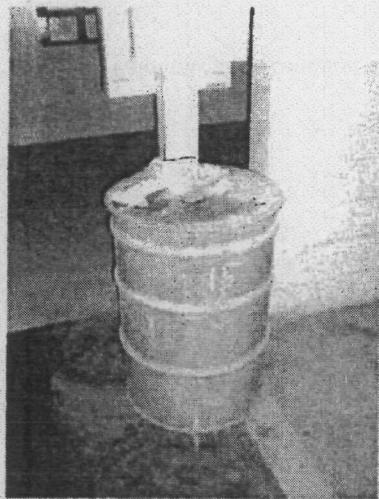


Photo 15 – HW drum for aerosol cans

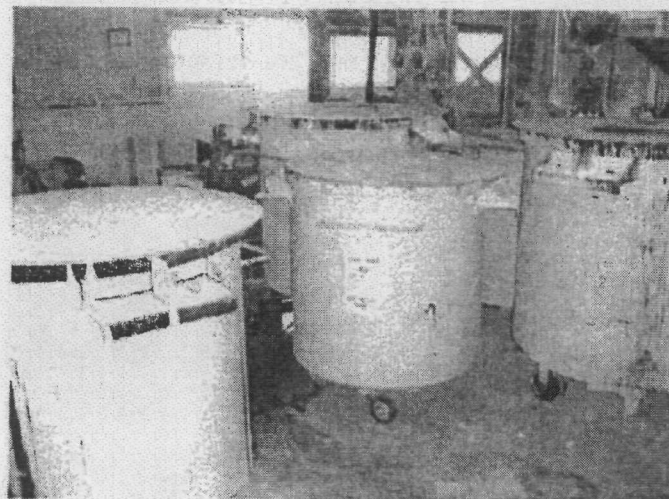


Photo 16 - SMC mix room containers

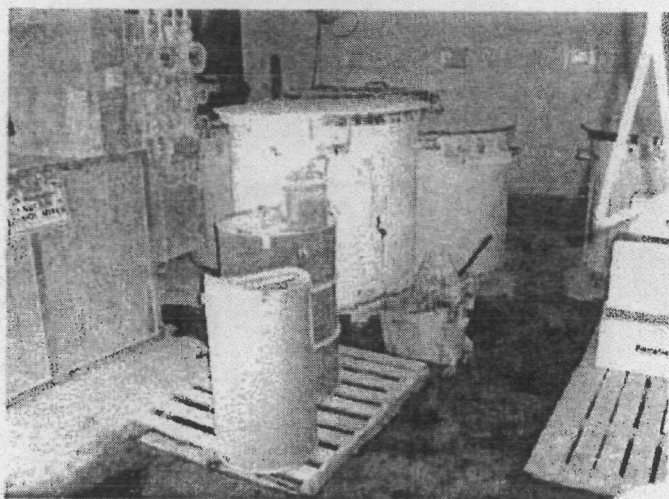


Photo 17 – SMC mix room blue styrene drum

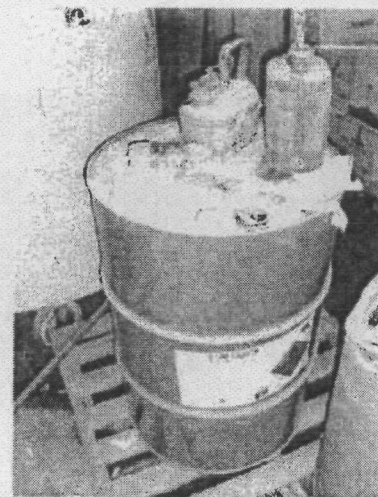


Photo 18 – SMC mix room small red containers (styrene)





Photo 19 – SMC mix room



Photo 20 - Unknown drums near SMC mix room

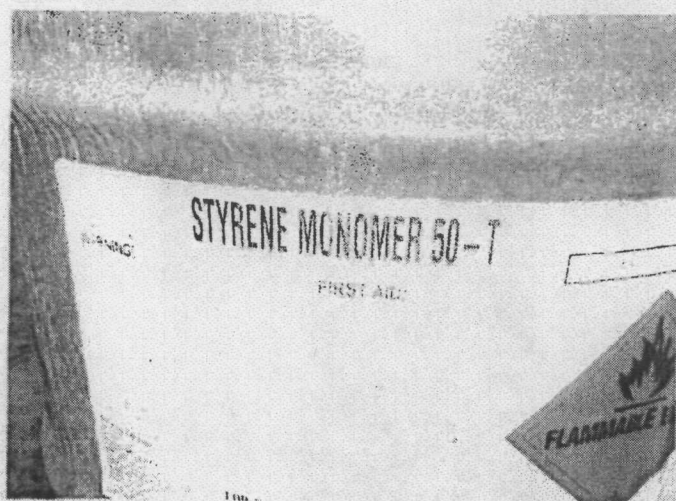


Photo 21 - Styrene monomer drum

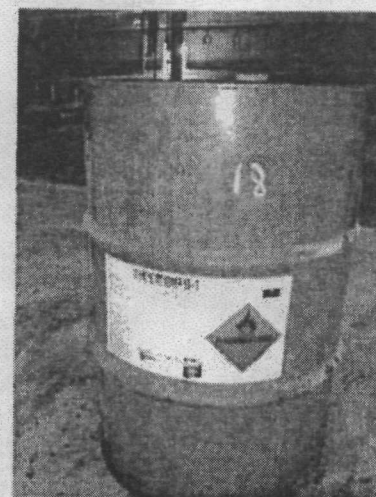


Photo 22 - Styrene monomer drum



Photo 23 – Small containers in  
fire cabinet



Photo 24 – Miscellaneous lab bottles

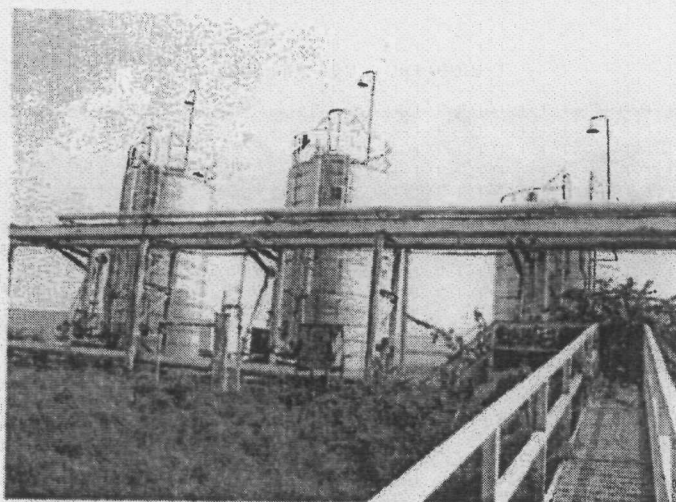


Photo 25 - Resin tank farm

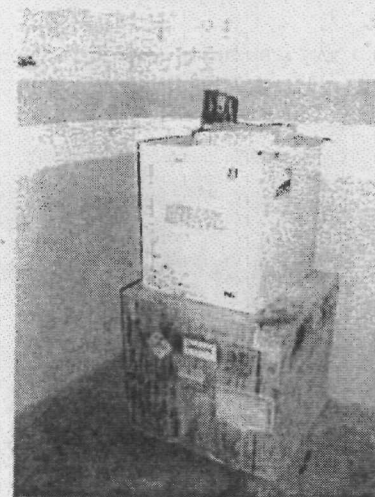


Photo 26 - Lab equipment  
containing radioactive source



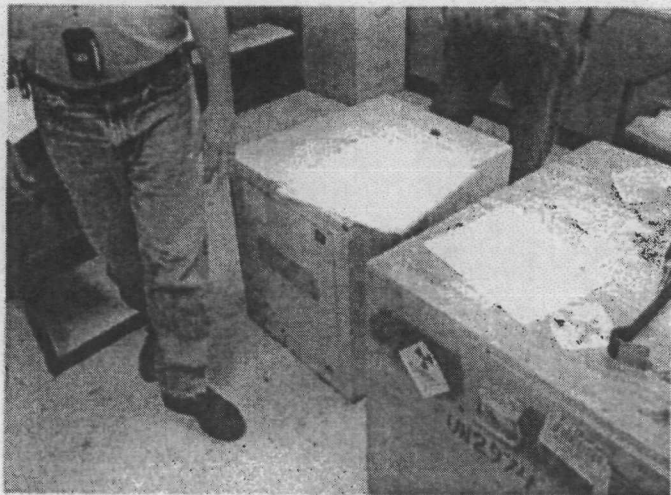


Photo 27 - Lab equipment containing radioactive source moved to locked office

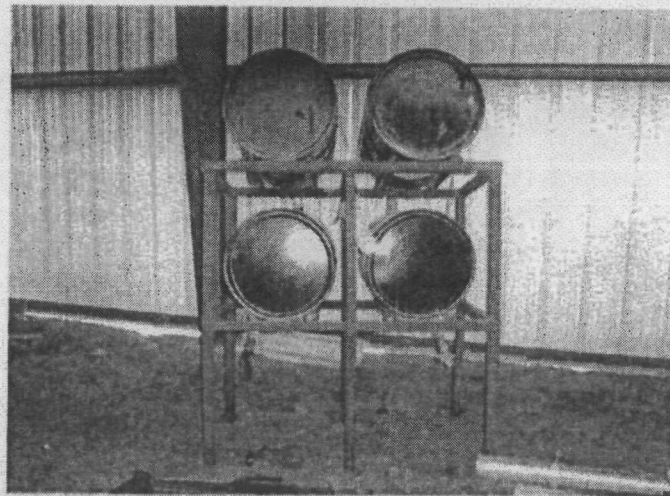


Photo 28 - Pliogrip drums

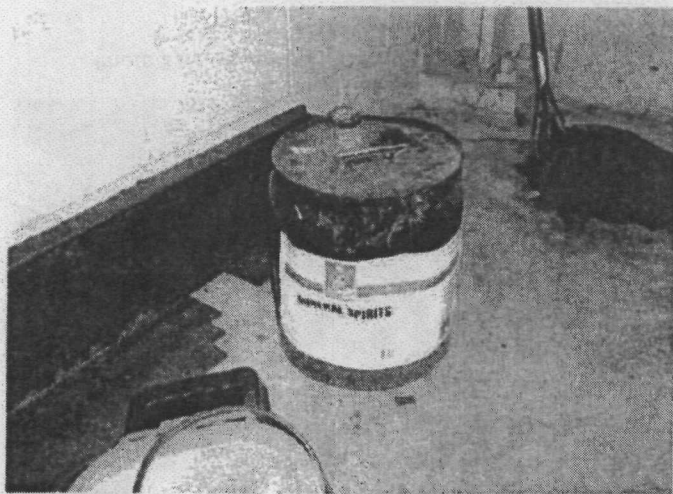


Photo 29 - Miscellaneous containers containing mineral spirits



Photo 30 - Miscellaneous 5 gallon buckets



Photo 31 – Boiler room miscellaneous containers



Photo 32 - Miscellaneous containers near waste location number 6



Photo 33 - Miscellaneous containers near waste location number 6

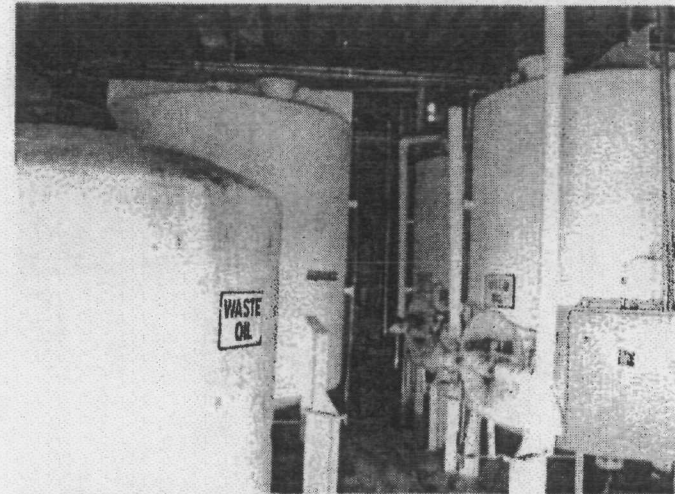


Photo 34 - Oil handling tanks all appear to be empty





Photo 35 - Oil water skimmer shed with container full of oil



Photo 36 - Oily sheen in ditch. On 8/29/09 oil/water mixture was pumped and containerized on site

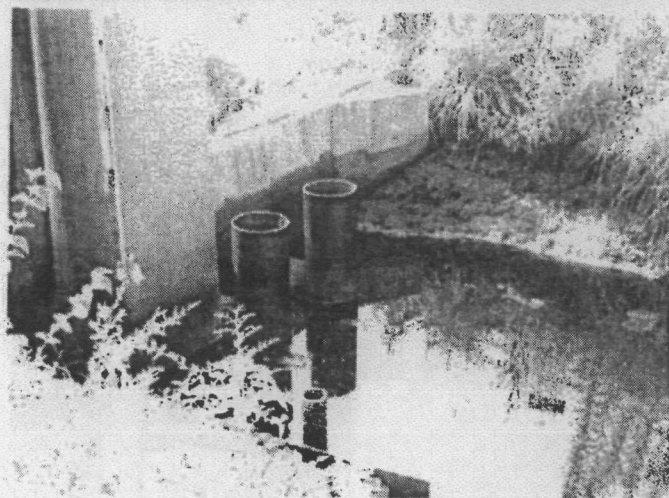


Photo 37 - Oily sheen in ditch. On 8/29/09 oil/water mixture was pumped and containerized on site

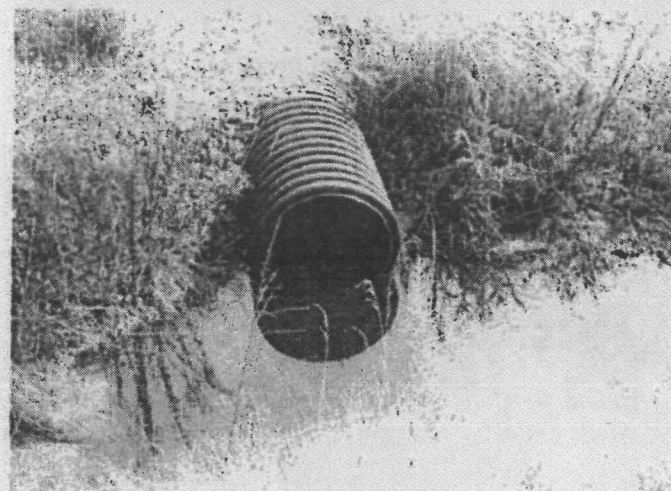


Photo 38 - Oily sheen in ditch. On 8/29/09 oil/water mixture was pumped and containerized on site

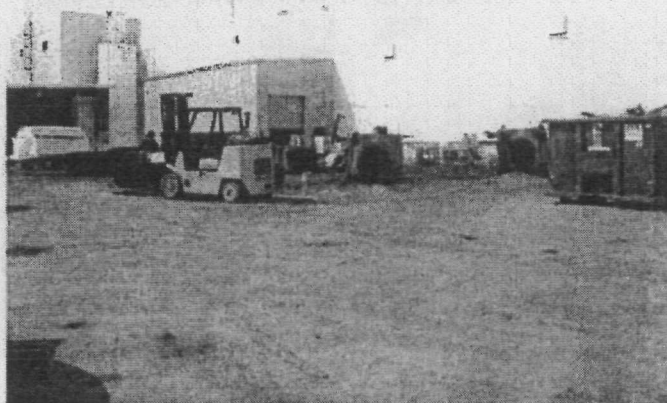


Photo 39 - Outside of plant where scrap steel contractor is working

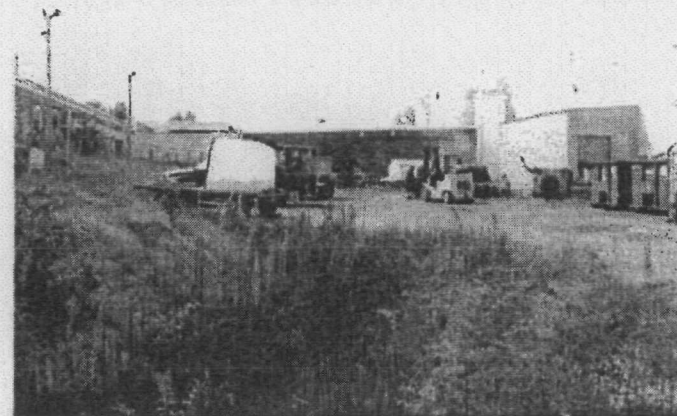


Photo 40 - Outside of plant

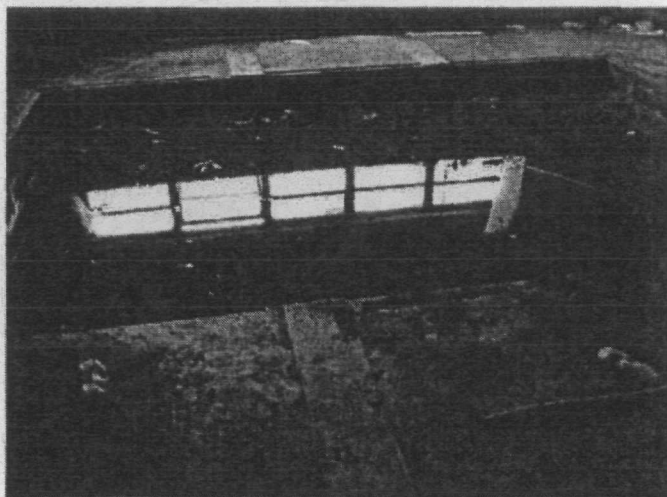


Photo 41 - Pit full of oil waste

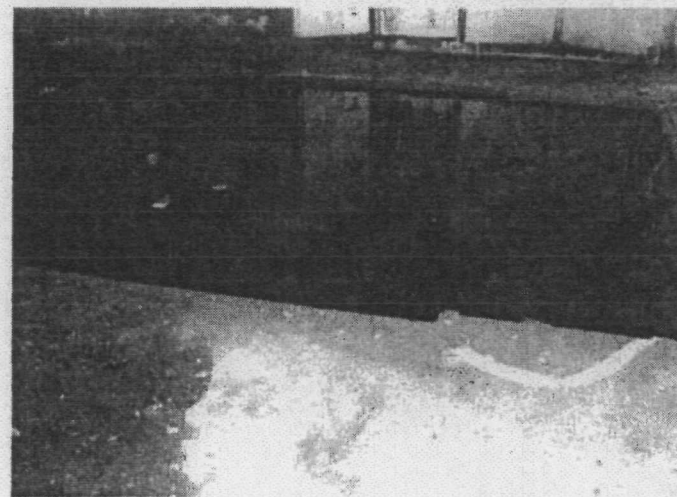


Photo 42 - Pit full of oil waste



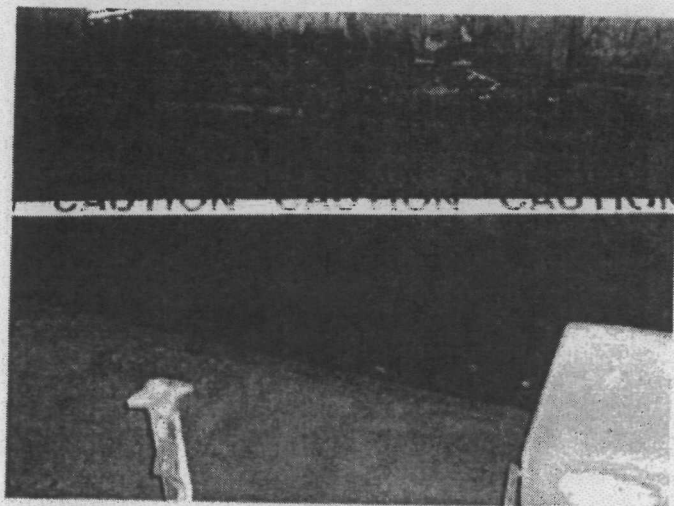


Photo 43 - Pit full of oil waste

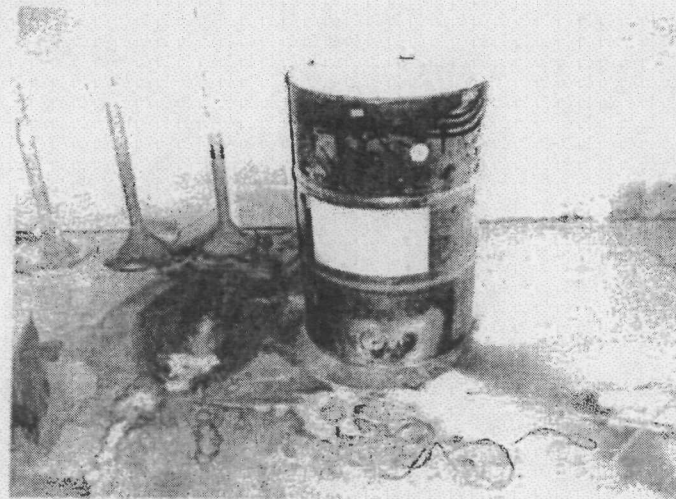


Photo 44 - Pliogrip drum

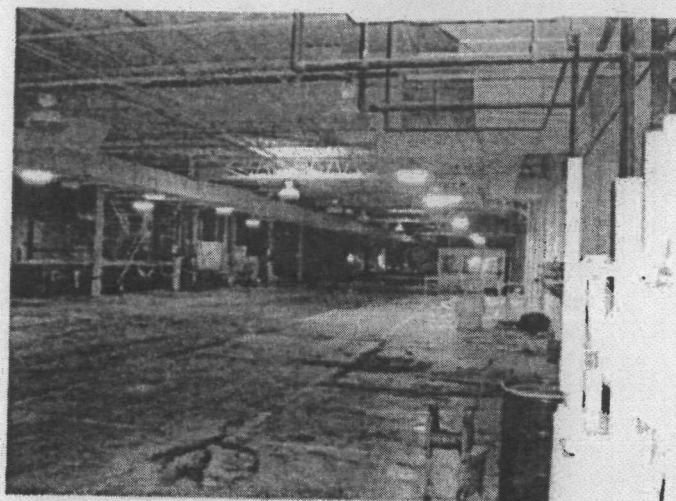


Photo 45 - Inside building looking down former press line